

EXHIBIT F

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(Pages 14 to 17)

<p style="text-align: right;">14</p> <p>1 to the paving, responsible for sidewalk</p> <p>2 sweeps -- I mean, the whole aspect of DPW, I've</p> <p>3 been involved in.</p> <p>4 Q. Since 1991?</p> <p>5 A. I worked my way up to foreman doing</p> <p>6 all of those things and then I became foreman in</p> <p>7 1991.</p> <p>8 Q. Okay. So just so I'm clear, from</p> <p>9 1985 to 1991, you were a skilled laborer?</p> <p>10 A. Right. Involved in road</p> <p>11 construction, sidewalk construction, sewer</p> <p>12 construction.</p> <p>13 Q. And also involved in snow?</p> <p>14 A. And also involved in snow, as a</p> <p>15 plow operator at the time.</p> <p>16 Q. And did you have a job description</p> <p>17 in that era that described what you were doing,</p> <p>18 from '85 to '91?</p> <p>19 A. Yes, there was a job description I</p> <p>20 wrote in for, yes.</p> <p>21 Q. Okay. From '85 to '91, was there</p> <p>22 any divide between snow type of DPW activities</p> <p>23 and road construction, that type of DPW work?</p> <p>24 A. I'm not sure what you mean by</p>	<p style="text-align: right;">16</p> <p>1 2013?</p> <p>2 A. Correct.</p> <p>3 Q. And then you left there in 2013 and</p> <p>4 that's when you came back to Springfield?</p> <p>5 A. Yes.</p> <p>6 Q. And you came back in October of</p> <p>7 2013?</p> <p>8 A. Yes, I did.</p> <p>9 Q. And you came back as the deputy</p> <p>10 director of operations for the Springfield DPW?</p> <p>11 A. Correct.</p> <p>12 Q. And was there a job description for</p> <p>13 that title as well?</p> <p>14 A. Yes, there was. It was -- I</p> <p>15 applied online for it, it was posted in the</p> <p>16 City's website.</p> <p>17 Q. Okay. And that's the same title</p> <p>18 you currently hold, correct?</p> <p>19 A. Correct.</p> <p>20 Q. Who is your boss currently?</p> <p>21 A. Chris Cignoli, C-I-G-N-O-L-I.</p> <p>22 Q. And how long has Chris been your</p> <p>23 boss?</p> <p>24 A. He became director in 2014.</p>
<p style="text-align: right;">15</p> <p>1 divide.</p> <p>2 Q. Was there a certain class of people</p> <p>3 that always did snow in '85 to '91 and not other</p> <p>4 activities?</p> <p>5 A. No, everybody did everything.</p> <p>6 Q. Okay. Now, in '91 your title</p> <p>7 became --</p> <p>8 A. Streets and engineering foreman.</p> <p>9 Q. And how long did you have that</p> <p>10 title for?</p> <p>11 A. Until 2001 when I took the position</p> <p>12 at West Springfield.</p> <p>13 Q. Okay. And as a streets and</p> <p>14 engineer foreman, did you similarly have</p> <p>15 activities involving snow as well as streets and</p> <p>16 all other activities that the DPW did?</p> <p>17 A. Yes.</p> <p>18 Q. Did you have a job description</p> <p>19 then?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And in 2001, you left to go</p> <p>22 to West Springfield, correct?</p> <p>23 A. Correct.</p> <p>24 Q. And you stayed there from 2001 to</p>	<p style="text-align: right;">17</p> <p>1 Q. And who was your boss before 2014?</p> <p>2 A. Al Chwalek, C-H-W-A-L-E-K, was the</p> <p>3 director at the time.</p> <p>4 Q. And Chris' and Al's title, were</p> <p>5 they the same?</p> <p>6 A. Chris is director of Springfield</p> <p>7 DPW.</p> <p>8 Q. Do you know how long Mr. Chwalek</p> <p>9 performed the job he was in?</p> <p>10 A. I believe he was there seventeen</p> <p>11 years.</p> <p>12 Q. And he's no longer with the City?</p> <p>13 A. He retired.</p> <p>14 Q. Do you know where he retired to, is</p> <p>15 he still in the area?</p> <p>16 A. Yes, he is.</p> <p>17 Q. Do you happen to know where he</p> <p>18 lives?</p> <p>19 A. He lives on Forest Hills. I don't</p> <p>20 know the address, but Forest Hills in</p> <p>21 Springfield.</p> <p>22 Q. Do you know his wife's name?</p> <p>23 A. No, I don't.</p> <p>24 Q. Do you know if he's married?</p>

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<p style="text-align: right;">66</p> <p>1 a storm?</p> <p>2 A. Yes.</p> <p>3 Q. Meaning the primary list is the</p> <p>4 people who get called in the event of a storm?</p> <p>5 A. Yes.</p> <p>6 Q. And these are the people who would</p> <p>7 get the Robo call?</p> <p>8 A. Yes.</p> <p>9 Q. And this is the list that was in</p> <p>10 existence, with the exception of your name, when</p> <p>11 you came into the DPW in 2013?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And then the people that you</p> <p>14 mentioned -- can I just -- I just need to get</p> <p>15 this for the record again --</p> <p>16 A. Yes.</p> <p>17 MS. BRODEUR-McGAN: Off the</p> <p>18 record.</p> <p>19 (Off-record conference)</p> <p>20 MS. BRODEUR-McGAN: Back on</p> <p>21 the record.</p> <p>22 Q. (By Ms. Brodeur-McGan) I'm going</p> <p>23 to repeat the question because I want to make</p> <p>24 sure that I have the complete list of those</p>	<p style="text-align: right;">68</p> <p>1 A. I apologize, yes, he was. I keep</p> <p>2 thinking about now. He's not a snow inspector</p> <p>3 now.</p> <p>4 Q. Okay. So we're going to revise the</p> <p>5 list again.</p> <p>6 A. Okay.</p> <p>7 Q. So Mr. Seldin, in 2013, was a snow</p> <p>8 inspector?</p> <p>9 A. He was.</p> <p>10 Q. Which department did he work in in</p> <p>11 2013?</p> <p>12 A. He was in solid waste still at the</p> <p>13 time.</p> <p>14 Q. Okay. And just again, I did not</p> <p>15 see an application for Mr. Seldin.</p> <p>16 A. Okay.</p> <p>17 Q. So can you tell me how it is that</p> <p>18 he got on the list of primary inspectors?</p> <p>19 A. No, I can't.</p> <p>20 Q. And Bob -- where does Bob work?</p> <p>21 A. Bob is IT.</p> <p>22 Q. And was he ever a snow inspector</p> <p>23 that you can recall?</p> <p>24 A. No.</p>
<p style="text-align: right;">67</p> <p>1 people who are not snow inspectors that appear</p> <p>2 on Exhibit 2's primary list. If you could</p> <p>3 repeat those names for me?</p> <p>4 A. Myself, Jacob Seldin, Bob Houldson,</p> <p>5 Steve Beem, Scott Donelon, Greg Superneau, and</p> <p>6 Steve Jankiewicz.</p> <p>7 Q. So that's seven names you gave me?</p> <p>8 A. Right.</p> <p>9 Q. So of the 26 names that appear on</p> <p>10 the primary list of Exhibit 2, 7 of them are not</p> <p>11 actually snow inspectors?</p> <p>12 A. Correct.</p> <p>13 Q. Did you perform as a snow inspector</p> <p>14 after you came back in 2013 for the DPW?</p> <p>15 A. No, I did not.</p> <p>16 Q. At some point, did Mr. Seldin</p> <p>17 become on the primary list for snow inspectors?</p> <p>18 A. He was a snow inspector and he was</p> <p>19 promoted to solid waste assistant manager, so he</p> <p>20 came off the primary list.</p> <p>21 Q. Do you know when he was promoted?</p> <p>22 A. 2015, because he was still on the</p> <p>23 main list here in '15.</p> <p>24 Q. So was he a snow inspector in 2013?</p>	<p style="text-align: right;">69</p> <p>1 Q. Okay. So of the 26 names, six of</p> <p>2 them are not snow inspectors. So we have 20</p> <p>3 names as snow inspectors that were primary</p> <p>4 inspectors in 2013?</p> <p>5 A. Correct.</p> <p>6 Q. So can you explain, if there were</p> <p>7 20 listed snow inspectors when you came in in</p> <p>8 2013, why did you need to post for new ones?</p> <p>9 A. I don't know why. That's a program</p> <p>10 I stopped.</p> <p>11 Q. Okay. Tell me about when you</p> <p>12 stopped the program.</p> <p>13 A. At the end of the 13/14 season I</p> <p>14 stopped it.</p> <p>15 Q. At the end of the 13/14 snow</p> <p>16 season?</p> <p>17 A. Yes.</p> <p>18 Q. You stopped what?</p> <p>19 A. The write-in for snow inspectors.</p> <p>20 Q. Is that because you didn't need new</p> <p>21 snow inspectors?</p> <p>22 A. Not necessarily, no, it was because</p> <p>23 I was getting applications from outside the</p> <p>24 department of people who had no base knowledge</p>

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<p style="text-align: right;">134</p> <p>1 not he wanted to do the snow inspector duties?</p> <p>2 A. We talked about it during his</p> <p>3 interview, yes.</p> <p>4 Q. And what did he say?</p> <p>5 A. He said he was willing to be a snow</p> <p>6 inspector.</p> <p>7 Q. Okay. But willing to and wanting</p> <p>8 to are two separate things. So did he express</p> <p>9 to you a desire for him to want to do those</p> <p>10 duties?</p> <p>11 A. He didn't express a negative</p> <p>12 reaction to it.</p> <p>13 Q. Okay. But you didn't hear any</p> <p>14 words that sounded like, I want to do the snow</p> <p>15 inspector responsibilities?</p> <p>16 A. Not to that -- no, not that exact</p> <p>17 wording.</p> <p>18 Q. I'm trying to get a sense of the</p> <p>19 reality of the conversation you had with</p> <p>20 Mr. Williamson, and it's fair to say that you</p> <p>21 told him he has to do this?</p> <p>22 A. I put it in the job description as</p> <p>23 performing.</p> <p>24 Q. Okay. So you said you put it in</p>	<p style="text-align: right;">136</p> <p>1 term backup.</p> <p>2 Q. And if Ms. Williams had been listed</p> <p>3 as a backup inspector, in fact, in the previous</p> <p>4 year, which is listed on 358, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. So just focusing on how</p> <p>7 Ms. Williams got removed from document 359 as a</p> <p>8 backup, if you could tell me how that happened?</p> <p>9 A. Yes. She was working with George</p> <p>10 Larue, who is number -- the 11th name down on</p> <p>11 357.</p> <p>12 Q. Okay. And that's relevant because?</p> <p>13 A. Because he was training her, and</p> <p>14 when I asked him how she was doing, he told me</p> <p>15 she wasn't doing what she needed to do.</p> <p>16 Q. During training?</p> <p>17 A. Yes. She was pretty much there to</p> <p>18 be there and didn't care much about what was</p> <p>19 happening, that's what I was told.</p> <p>20 Q. And when were you told that?</p> <p>21 A. After the snowstorm. After he was</p> <p>22 telling me he was getting ready to retire.</p> <p>23 Q. And when was that?</p> <p>24 A. After that season also.</p>
<p style="text-align: right;">135</p> <p>1 the job description. You actually added to the</p> <p>2 job description for foreman for DPW?</p> <p>3 A. Yes.</p> <p>4 Q. When do you think you first edited</p> <p>5 the foreman job description?</p> <p>6 A. He probably was the first, because</p> <p>7 Mr. Sumares was the first foreman to retire</p> <p>8 under my watch.</p> <p>9 (Time stamped at 1:55 p.m.)</p> <p>10 MS. BRODEUR-McGAN: Please</p> <p>11 mark that question.</p> <p>12 (Question marked in Index)</p> <p>13 MS. BRODEUR-McGAN: I'm going</p> <p>14 to ask that you produce the job</p> <p>15 description for foreman that you actually</p> <p>16 drafted, that you just referenced in this</p> <p>17 deposition, okay?</p> <p>18 Q. (By Ms. Brodeur-McGan) So going</p> <p>19 back to -- well, actually, let's look at this</p> <p>20 document while we have it in front of us, Bates</p> <p>21 Stamp 359. This document does not have</p> <p>22 Ms. Williams on the document as a backup,</p> <p>23 correct?</p> <p>24 A. Spare inspector, but not under the</p>	<p style="text-align: right;">137</p> <p>1 Q. So when you're saying that season,</p> <p>2 which season?</p> <p>3 A. The 13/14 season. He retired in</p> <p>4 '14.</p> <p>5 Q. And did you -- the position</p> <p>6 statement that was filed with the MCAD that we</p> <p>7 looked at earlier, Exhibit 4, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Nowhere in here does it say that</p> <p>10 Mr. Larue had any issues with the training of</p> <p>11 Ms. Williams, is that fair to say?</p> <p>12 A. That's fair to say.</p> <p>13 Q. And is it also fair to say that in</p> <p>14 Exhibit 4, the document that was given to the</p> <p>15 Commission, said that Mr. Larue was out for an</p> <p>16 extended period of time and could not train</p> <p>17 Ms. Williams?</p> <p>18 A. No.</p> <p>19 Q. Does that ring any bells?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did you ever tell</p> <p>22 Ms. Williams that Mr. Larue, who was getting</p> <p>23 ready to retire, had issues with the training of</p> <p>24 Ms. Williams?</p>

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<p style="text-align: right;">138</p> <p>1 A. No.</p> <p>2 Q. Did anybody ever tell her that?</p> <p>3 A. No.</p> <p>4 Q. Why?</p> <p>5 A. I don't know.</p> <p>6 Q. Were you made aware that</p> <p>7 Ms. Williams brought a MCAD complaint?</p> <p>8 A. Yes.</p> <p>9 Q. Did she actually tell you that she</p> <p>10 believed she was being discriminated against?</p> <p>11 A. Yes.</p> <p>12 Q. And did you have a face-to-face</p> <p>13 conversation with her about it?</p> <p>14 A. I told her that she needed more</p> <p>15 training.</p> <p>16 Q. I didn't hear that. I'm sorry?</p> <p>17 A. She needed more training. She also</p> <p>18 was not going to get called every storm, backups</p> <p>19 do not always get called, and I explained that</p> <p>20 to her. And she wanted to be a primary and I</p> <p>21 said, you're not ready.</p> <p>22 Q. Did you ever tell her that you were</p> <p>23 going to remove her from the list as a backup</p> <p>24 because Mr. Larue had issues with things that</p>	<p style="text-align: right;">140</p> <p>1 Q. Okay. But you gave me some more</p> <p>2 background of what Mr. Larue said about her.</p> <p>3 A. That's what he told me. I asked</p> <p>4 him to put it in writing and he never did.</p> <p>5 Q. Okay. Well, you were his</p> <p>6 supervisor, right?</p> <p>7 A. Yes.</p> <p>8 Q. So why didn't you make him put it</p> <p>9 in writing?</p> <p>10 A. When I told him to put it in</p> <p>11 writing, he said he would, and the next thing I</p> <p>12 know he's retiring. It wasn't like I had much</p> <p>13 of a chance to get after him.</p> <p>14 Q. Okay. So you personally removed</p> <p>15 Ms. Williams from the backup list as a backup</p> <p>16 inspector?</p> <p>17 A. Yes.</p> <p>18 Q. And you did that the year that it</p> <p>19 came in effect, which was which year?</p> <p>20 A. '15.</p> <p>21 Q. So that would have been the 2015 to</p> <p>22 2016 snow year?</p> <p>23 A. Yes.</p> <p>24 Q. Listed on Bates Stamp 359?</p>
<p style="text-align: right;">139</p> <p>1 she did while training?</p> <p>2 A. I removed a lot of people from the</p> <p>3 backup list. There's a reason for it, and I'm</p> <p>4 going to tell you why.</p> <p>5 Q. You have to answer my question.</p> <p>6 MS. deSOUSA: You have to let</p> <p>7 her ask the questions.</p> <p>8 THE WITNESS: I get it.</p> <p>9 MS. deSOUSA: You're trying to</p> <p>10 answer a question she hasn't asked you</p> <p>11 yet.</p> <p>12 THE WITNESS: I have a hard</p> <p>13 time with certain -- I'm used to being in</p> <p>14 charge. I'm sorry.</p> <p>15 Q. (By Ms. Brodeur-McGan) So my</p> <p>16 question was, you were having a face-to-face</p> <p>17 conversation with her about her concerns, and</p> <p>18 specifically discrimination, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And you did not tell her that</p> <p>21 Mr. Larue had some concerns about her</p> <p>22 performance while training?</p> <p>23 A. I didn't say that. I said she</p> <p>24 needed more training to be a primary.</p>	<p style="text-align: right;">141</p> <p>1 MS. deSOUSA: So I have 359 as</p> <p>2 14 to 15.</p> <p>3 A. Yes. Remember I told you that was</p> <p>4 a typo on the top.</p> <p>5 Q. But I thought you said it was 15 to</p> <p>6 16?</p> <p>7 A. I have 2015/16 here. I got</p> <p>8 confused because I didn't have this paper in</p> <p>9 front of me, and I was kind of trying to figure</p> <p>10 out all of these graphs.</p> <p>11 MS. deSOUSA: Which makes</p> <p>12 sense, because 358 is FY 14, so that's 13</p> <p>13 to 14, and 359 would be 14 to 15, and then</p> <p>14 360 is 15/16.</p> <p>15 Q. Okay. Well, I'm going to have the</p> <p>16 witness go through each number and say what he</p> <p>17 thinks it is, because I had it backwards. In</p> <p>18 fact, I asked him --</p> <p>19 MS. deSOUSA: I know, there's</p> <p>20 a typo.</p> <p>21 A. And because I didn't have this one</p> <p>22 in front of me, I got a little messed up.</p> <p>23 Q. So because you did not have 357 in</p> <p>24 front of you, you got messed up?</p>

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<p style="text-align: right;">170</p> <p>1 A. He was out, okay, but he was back 2 by January, which was the same season. 3 Q. So on page 5 of 7, I'm going to 4 read this, it says, "He felt that she needed 5 more training before she could go out on her 6 own. That training took place and was completed 7 when the complainant and Mr. Larue went out, 8 together in response to snowfall on January 3, 9 2014." 10 A. Right. 11 Q. Did I read that accurately? 12 A. Yes. 13 Q. Was her training completed on 14 January 3, 2014? 15 A. Not that I felt, no. 16 Q. Okay. But this document says her 17 training was completed on January 3, 2014, 18 correct? 19 A. That's what it says, yes. 20 Q. Do you have any reason to believe 21 that it's inaccurate? 22 A. I might have misread it. I don't 23 know. 24 Q. Okay. Well, sitting here today --</p>	<p style="text-align: right;">172</p> <p>1 Q. Okay. And do you know if she had 2 additional training other than that? 3 A. No. She actually had to stay on 4 that on her own when he went home. It was a 5 double day storm, and he was probably in his 6 sixties, and he couldn't keep going, so -- 7 Q. Okay. So she actually performed 8 the role of an inspector? 9 A. She was there, she was out there. 10 Q. Doing the job? 11 A. Not adequately, no. 12 Q. Okay. And you know it was not 13 adequate because -- 14 A. Because I went through the section 15 when she said she was done and signed out all 16 her trucks, and it was a disaster, that's how. 17 Q. And is there any documentation that 18 memorialized that, you said you went through her 19 section and -- 20 A. No. No, there was no 21 documentation. That's not how I do things, I 22 guess. 23 Q. Did you share with Ms. Williams 24 that her section was a disaster?</p>
<p style="text-align: right;">171</p> <p>1 MS. deSOUSA: I'm going to ask 2 that he be allowed to read the entire 3 paragraph. 4 A. You're assuming that completed 5 means that she was fully trained. That's not 6 what that says, from my look. It says training 7 took place and was completed on this snowstorm. 8 That doesn't mean that her training was 9 completed, that particular day was. That's how 10 I read it. 11 Q. So the sentence that says that the 12 training took place and was completed when the 13 complainant and Mr. Larue went out together in 14 response to snowfall on January 3, 2014, does 15 not mean that her training was completed on 16 January 3, 2014? 17 A. That's how I read it. 18 Q. Okay. So was there additional 19 training that she had after January 3, 2014 that 20 you were aware of? 21 A. February 14, 2014. 22 Q. Okay. And do you know who did 23 that? 24 A. Mr. Larue.</p>	<p style="text-align: right;">173</p> <p>1 A. No. I just sent my guys out, the 2 other guys out, and just had it cleaned up. 3 Because I got -- you know, when someone sees 4 that and all the complaints, then I have to go 5 down to the mayor's office and answer to him, so 6 I just had it taken care of. That's how I dealt 7 with it. 8 Q. Okay, had it cleaned up. She 9 wasn't not plowing, she was inspecting? 10 A. Right. But she had sent all the 11 trucks home, so there was no one to finish 12 cleaning it up. 13 Q. Okay. So -- and this was which 14 storm? 15 A. The 14/15, Valentine's Day. 16 Q. February? 17 A. February, yes. 18 Q. Year? February 14, 2014? 19 A. Correct. 20 Q. And again, there's nothing in the 21 MCAD documentation that says this, correct? 22 A. No. 23 MS. deSOUSA: Well, other than 24 what he's reading from.</p>

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<p style="text-align: right;">174</p> <p>1 Q. (By Ms. Brodeur-McGan) Let me 2 rephrase this. There's nothing in the 3 documentation that was given to the MCAD that 4 memorialized that you inspected Ms. Williams' 5 inspection work after the storm of February 14, 6 2014 and you felt she had done a poor job? 7 A. Correct. They didn't ask me that. 8 I responded to the questions they asked me. 9 Q. Okay. So did you remove 10 Ms. Williams as an inspector because she had 11 done a poor job? 12 A. No, I removed her because I was 13 trying to get people with a base skill back into 14 the system like it used to be. People that knew 15 the roads, people that deal with vendors, people 16 that deal with contractors, people that deal 17 with complaints, people that deal with resident 18 complaints. 19 Q. And how did you accomplish that? 20 A. By going with foremen, working 21 foremen, code enforcers who have to deal with 22 irate people every day, who know the streets 23 better than anybody, people that are always 24 there. That's how I went by.</p>	<p style="text-align: right;">176</p> <p>1 THE WITNESS: I'm just tired. 2 MS. deSOUSA: I know, it's a 3 long day. 4 Q. (By Ms. Brodeur-McGan) So the 5 persons that you hired -- you did hire people to 6 do snow inspectors -- to be a snow inspector, 7 additional people who were not originally on the 8 list when you took over in 2013, correct? 9 A. Did I hire people, no. 10 Q. Well, you've made people perform 11 the function of snow inspector after you came in 12 in 2013, correct? 13 A. Yes. 14 Q. And you were involved in some of 15 that decision making? 16 A. Yes. 17 Q. You've already testified to some of 18 your thought process? 19 A. Yes. 20 Q. And some of the persons that you 21 added to make them perform the function of snow 22 inspectors, one you told me was Mr. Ed 23 Williamson. Who else did you add to the mix, or 24 to the list?</p>
<p style="text-align: right;">175</p> <p>1 Q. And again, you did not change the 2 snow inspector job description to reflect that? 3 A. No. 4 Q. But you did change the foreman 5 description to reflect that foremen had to be 6 snow inspectors? 7 A. Correct. 8 Q. Okay. 9 A. I didn't change the inspector job 10 description because I never posted it again. If 11 I had to post it again, I would have changed it. 12 Q. Okay. But you did hire for it? 13 A. I hired -- all the guys that -- all 14 the people that I just mentioned, code 15 enforcement, they were all on here already. I 16 didn't hire anybody. 17 Q. And they are all guys, right? 18 A. That's neither here nor there. 19 Q. Well, actually, this is a gender 20 discrimination. 21 A. I understand that. But if I had -- 22 MS. deSOUSA: Yes, they are 23 all men. We'll stipulate that for the 24 record.</p>	<p style="text-align: right;">177</p> <p>1 A. I added Connor Knightly, Luca 2 Mineo, Tyrone Holt. 3 Q. And who else? 4 A. Nobody. 5 Q. And when did you add them? 6 A. After the 2014 season. 7 Q. So after 2014/15 snow season? 8 A. Hang on. At different times. A 9 couple of them were -- Luca and Connor were 10 2014/15. Tyrone was not until 2015/16, and 11 Eddie was right after Mr. Sumares retired in 12 2014. 13 Q. And they had to be trained? 14 A. Yes. 15 Q. And you had to pay them to train? 16 A. Yes. 17 Q. Okay. Did you ever consider 18 training Jean Williams properly to do the 19 function of snow inspector? 20 A. No. 21 Q. Why not? 22 A. I just didn't. 23 Q. Okay. And the list on 363 of 24 people that were trained, it says, trained as</p>